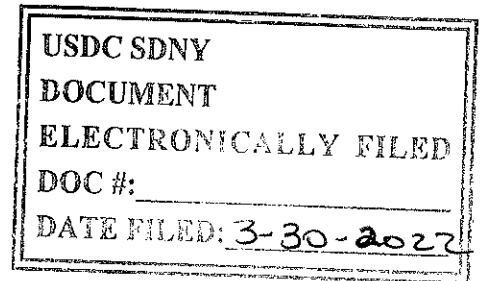


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
JOSH WEBBER, et al.,



Plaintiffs,

19 Civ. 0610 (RWL)

-against-

DAMON DASH, et al.,

Defendants.
-----X

JURY VERDICT FORM

Please answer these questions based on the evidence and the Court's instructions on the law. All jurors must agree on the answer to each question. The term "Movie" refers to the movie film known as Dear Frank or The List.

COPYRIGHT INFRINGEMENT CLAIM

1. Muddy Water Pictures is presumed to be the sole owner of the Movie. Has Damon Dash rebutted that presumption and proven by a preponderance of the evidence that the Movie was a joint work?

Yes _____ No ☒

2. Muddy Water Pictures is presumed to be the sole owner of the Movie. Has Poppington LLC rebutted that presumption and proven by a preponderance of the evidence that the Movie was a joint work?

Yes _____ No ☒

IF YOU ANSWERED "YES" TO EITHER QUESTION 1 OR 2, THEN GO TO QUESTION 10. IF YOU ANSWERED "NO" TO BOTH QUESTION 1 AND 2, THEN PROCEED TO QUESTION 3.

3. Muddy Water Pictures is presumed to be the sole owner of the Movie. Has Damon Dash rebutted that presumption and proven by a preponderance of the evidence that Damon Dash is the dominant author of the Movie?

Yes _____ No ☒

4. Muddy Water Pictures is presumed to be the sole owner of the Movie. Has Poppington LLC rebutted that presumption and proven by a preponderance of the evidence that Poppington LLC is the dominant author of the Movie?

Yes _____ No ☒

IF YOU ANSWERED "YES" TO EITHER QUESTION 3 OR 4, THEN GO TO QUESTION 10. IF YOU ANSWERED "NO" TO BOTH QUESTION 3 AND 4, THEN PROCEED TO QUESTION 5.

5. Has Muddy Water Pictures proven by a preponderance of the evidence that Damon Dash infringed Muddy Water Pictures' copyright in the Movie?

Yes ☒ No _____

IF YOU ANSWERED "YES," THEN PROCEED TO QUESTION 6. IF YOU ANSWERED "NO," THEN GO TO QUESTION 7.

6. Has Muddy Water Pictures proven by a preponderance of the evidence that Damon Dash infringed willfully?

Yes _____ No ☒

7. Has Muddy Water Pictures proven by a preponderance of the evidence that Poppington LLC infringed Muddy Water Pictures' copyright in the Movie?

Yes ☒ No _____

IF YOU ANSWERED "YES" THEN PROCEED TO QUESTION 8. IF YOU ANSWERED "NO" THEN GO TO QUESTION 9.

8. Has Muddy Water Pictures proven by a preponderance of the evidence that Poppington LLC infringed willfully?

Yes _____ No ☒

9. ANSWER THIS QUESTION ONLY IF YOU ANSWERED "YES" TO EITHER QUESTION 5 OR 7, OR BOTH. IF YOU ANSWERED "NO" TO BOTH QUESTIONS 5 AND 7 THEN GO TO QUESTION 10.

What amount of damages do you find that Muddy Water Pictures should receive for infringement of its copyright in the Movie?

\$ 30,000

DEFAMATION CLAIMS

10. Has Josh Webber proven by a preponderance of the evidence that he was defamed by Damon Dash?

Yes ☒ No ☐

11. Has Josh Webber proven by a preponderance of the evidence that he was defamed by Poppington LLC?

Yes ☒ No ☐

12. ANSWER THIS QUESTION ONLY IF YOU ANSWERED "YES" TO EITHER QUESTION 10 OR 11. IF YOU ANSWERED "NO" TO BOTH QUESTIONS 10 AND 11, THEN GO TO QUESTION 13.

- a. What amount of compensatory damages do you find that Josh Webber should recover for defamation?

\$ 400,000

- b. What amount, if any, do you find that Josh Webber should receive as punitive damages?

\$ 250,000

13. Has Muddy Water Pictures proven by a preponderance of the evidence that it was defamed by Damon Dash?

Yes ☒ No ☐

14. Has Muddy Water Pictures proven by a preponderance of the evidence that it was defamed by Poppington LLC?

Yes ☒ No ☐

15. ANSWER THIS QUESTION ONLY IF YOU ANSWERED "YES" TO EITHER QUESTION 13 OR 14. IF YOU ANSWERED "NO" TO BOTH QUESTIONS 13 AND 14, THEN GO TO THE END AND SIGN THE VERDICT FORM.

- a. What amount of compensatory damages do you find that Muddy Water Pictures should recover for defamation?

\$ 0

- b. What amount, if any, do you find that Muddy Water Pictures should receive as punitive damages?

\$ 125,000

Foreperson, please sign and date this Jury Verdict Form and advise the Court by note that you have reached a verdict and are ready to return to the courtroom to announce it.

Dated: New York, New York
~~March 29, 2022~~

March 30, 2022



FOREPERSON

Hannah Coleman